

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

TITLE V DRAFT PERMIT No. V-99-011

R.R. DONNELLEY & SONS COMPANY

DANVILLE, KY.

June 5, 2000

RICK SHEWEKAH, REVIEWER

Plant I.D. # 102-0360-0037

Application Log # F460

SOURCE DESCRIPTION:

The company is engaged in a commercial printing business which uses the "offset " lithographic process. The source has nine (9) heatset lithographic presses to print magazines. All nine presses are connected with a collection plenum where the emissions are captured and controlled by 3 thermal oxidizers. The company claims a 95% destruction efficiency.

COMMENTS:

- Type of control and efficiency: 3 thermal oxidizers with 95% destruction efficiency
- Emission factors were used from material balance.
- Applicable regulation: no applicable regulation.
- The first 7 presses were combined together under one emission cap (less than 250 tpy), since those presses were constructed under the authority of permit C-84-167 which limits the source to less than 250 tpy (preclude PSD).

EMISSION AND OPERATING CAPS DESCRIPTION:

- The VOC emissions from 7(seven) presses (EP# 1,2,3,4,5,6,7) are limited to less than 250 tons per year.
- Press EP# 9 has a VOC emission limitation less than 40 tons per year.

OPERATIONAL FLEXIBILITY:

Since emission caps have been placed across more than one individual press, operational flexibility is provided since emissions can be traded under the cap.

PERIODIC MONITORING:

Monitoring devices will continuously indicate and record the combustion chamber temperature of the thermal oxidizers. The company will conduct a performance test(s) on the thermal oxidizers, which results in determining the overall efficiency of thermal oxidizers. In addition, an average temperature of each thermal oxidizer will be established during the performance test and its very essential to monitor this temperature in order to verify compliance with the emission limitations given in the permit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.